

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CASCADE DESIGNS, INC., a Washington
Corporation,

Plaintiff,

v.

JAB DISTRIBUTORS, LLC, an Illinois
corporation,

Defendant.

Case No. 2:18-cv-1806-TSZ

STIPULATED MOTION AND ORDER TO
STAY, FOR ONE WEEK, TWO
SENTENCES OF THE DEFAULT
JUDGMENT

Pursuant to LCR 10(g), Plaintiff Cascade Designs, Inc. and Defendant JAB Distributors, LLC, through counsel, hereby stipulate and move this Court for an Order staying, by only one week, this Court's Default Judgment, only with respect to the following:

1. "JAB must deliver to CDI's counsel its entire inventory of infringing products, including, without limitation, its sleep products, packaging, labeling, advertising and promotional material, and all plates, patterns, molds, matrices, and other material for producing or printing such items, that are in its possession or subject to its control and that infringe the THERM-A-REST® Marks."; and

2. "[T]he Commissioner of the United States Patent and Trademark Office is DIRECTED to cancel Registration Nos. 4,538,345 and 5,138,979.".

The reasons justifying the proposed change are as follows: the parties are engaged in active settlement discussions, which discussions might lead to an agreement that would lead to an un-winding or reversal of the foregoing ordered acts.

1 Accordingly, upon issuance of an Order, the foregoing obligations shall be perfected in
2 full no later than May 31, 2019, and the remainder of this Court's April 24, 2019 Order remains
3 undisturbed. Nothing in this Stipulated Motion or [Proposed] Order shall prevent the parties from
4 seeking further relief.

5 Dated this 24th day of May, 2019.

6 Respectfully Submitted,

7 FOCAL PLLC

8 By: s/ Venkat Balasubramani
9 Venkat Balasubramani, WSBA #28269
10 900 1st Avenue S., Suite 201
11 Seattle, Washington 98134
12 Tel: (206) 529-4827
13 Fax: (206) 260-3966
14 Email: venkat@focallaw.com

15 LEVENFELD PEARLSTEIN, LLC

16 By: s/ Paula Jill Krasny
17 Paula Jill Krasny (admitted *pro hac vice*)

18 s/ George J. Spathis
19 George J. Spathis (admitted *pro hac vice*)
20 2 N. LaSalle St. Suite 1300
21 Chicago, Illinois 60602
22 Tel: (312) 476-7585
23 Email: pkrasny@lplegal.com
24 Email: gspathis@lplegal.com

25 *Attorneys for Defendant JAB Distributors, LLC*

26 BAKER & HOSTETLER LLP

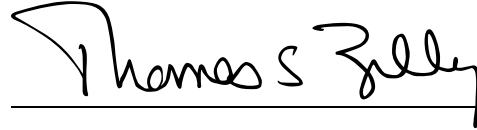
27 By: s/Anthony Robert Sterling
Anthony Robert Sterling, WSBA No. 53424
Douglas Anderson Grady, WSBA No. 36100
999 Third Avenue, Suite 3600
Seattle, WA 98104-4040
Telephone: (206) 332-1380
Fax: (206) 624-7317
asterling@bakerlaw.com
dgrady@bakerlaw.com

Attorneys for Plaintiff Cascade Designs, Inc.

1 **ORDER**

2 IT IS SO ORDERED.

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4 DATED this 24th day of May, 2019.

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7 Thomas S. Zilly
8 United States District Judge
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